

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: APPLICATION OF EXCHANGE
UNION COMPANY ET AL.

Case No. 24-mc-91645-ADB

**SMART RIVER INVESTMENTS LIMITED’S RESPONSE TO PETITIONERS’
MOTION TO SET OR CLARIFY RESPONSE DEADLINE**

Smart River Investments Limited (“Smart River”) takes no position on the Motion to Set or Clarify Response Deadline filed by Exchange Union Company, Shanghai Huiyin Group Co. Ltd., Shanghai Shengyi Information Network Co., Ltd., and Wo Wei Dong (“Petitioners”), dated February 7, 2025 (ECF No. 29) (the “Motion”). We write to request conditional relief in the event the Court grants the Motion.

If the Court grants Petitioners’ requested extension, Smart River respectfully requests that the filing deadlines for Smart River’s motion to quash are stayed pending resolution of the Motion to Intervene, Motion to Proceed Under Pseudonym, or Motion for Leave to File Identities Under Seal filed by Does 1 and 2 (ECF Nos. 15, 19, 23), so that Smart River’s filing deadlines remain the same as the filing deadlines for any other motions to quash. Filing all motions to quash simultaneously rather than sequentially will be most efficient for the Court, and this schedule will prevent Petitioners from having a *de facto* sur-reply to Smart River’s motion to quash in their opposition to the Doe parties’ motion to quash.

Dated: February 10, 2025

Respectfully submitted,

/s/ Abena Mainoo

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Response to Motion was filed through the ECF system and will be electronically served on counsel on counsel of record who are registered users of ECF on February 10, 2025.

/s/ Abena Mainoo
Abena Mainoo